

EXHIBIT A

From: Kim Zeldin <kzeldin@lftcllp.com>
Sent: Tuesday, July 8, 2025 9:53 PM
To: Roeser, Stephanie
Cc: Nathan, Aaron E.; Bruno, Matthew; Gottlieb, Michael; Meryl Governski; Hudson, Esra; Connolly, Michaela; Climaco, Katelyn; Summer Benson; Bender, Kristin; Cortni Davis; Vaneta Birtha; Jose Perez; Ellyn Garofalo; Amir Kaltgrad; Rose Khatchikian; Bryan Freedman; Jason Sunshine; Local MS. Counsel; Local KAF. Counsel; mitra@ahouraianlaw.com; Christina Puello; Theresa Troupson
Subject: RE: Lively v. Wayfarer - Deposition Scheduling [IMAN-MATTERS.FID37300]

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Counsel:

We agree to your request to postpone Ms. Lively's deposition currently scheduled for July 17, 2025. As the film footage will be produced by July 11, 2025, please provide us with several available dates in late July for Ms. Lively's deposition. The deposition will be take place at the offices of Meister Seelig & Fein, which has security, as set forth in the original deposition notice. Let us know by noon PT tomorrow the available alternative dates for Ms. Lively's deposition and whether court intervention is necessary on the location issue.

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From: Roeser, Stephanie <SRoeser@manatt.com>
Sent: Monday, July 7, 2025 2:46 PM
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Connolly, Michaela <MConnolly@willkie.com>; Climaco, Katelyn <KClimaco@manatt.com>

Subject: Lively v. Wayfarer - Deposition Scheduling

Counsel,

We write regarding Ms. Lively's upcoming July 17 deposition. As we have emphasized in letter and email on June 11 and June 17, and during the parties' meet and confer on June 13, Ms. Lively's receipt and review of the film footage on which you may rely for her deposition is a necessary precondition to her sitting for a deposition in this matter. In fact, we agreed to a continuance of Ms. Lively's deposition from the originally noticed date of June 23 to July 17 "[o]n the understanding that **all footage to be produced in this case**, including the footage that may be used or relied on in Ms. Lively's deposition, **will be produced by July 1.**" Timely production of documents and footage is critical because, as we have repeatedly communicated, Ms. Lively will not sit for a deposition more than once.

On June 26, you estimated that you would substantially complete a production of 100 TBs of film footage data "by July 1, with the few remaining hard drives to arrive shortly thereafter next week." In response to our request for tracking numbers for the drives on July 1 (none of which we had received at the time of our email), you indicated that the majority of the drives should have arrived and that the final drives "should arrive prior to the holiday." It has been nearly a week since July 1, and four days since the July 4 holiday, but we still do not have all the film footage you intend to produce. Instead, by July 1, you produced 14 slip sheets, allegedly corresponding to each of the hard drives had sent or intended to send, and only 3 hard drives. Just this afternoon, you advised that there has been a "processing delay," indicating that the final three hard drives have not even been shipped. We have repeatedly stated that timely production of the film footage is a gating issue. Ms. Lively's deposition is scheduled to take place in 10 days, and as of this writing, you have refused to provide even a tracking number for the final set of hard drives that were purportedly due to arrive *before* July 4. If you wish to proceed with Ms. Lively's deposition on July 17, please confirm when we can expect the remaining hard drives no later than 12:00 p.m. PT tomorrow.

Assuming that all footage will in fact be delivered to us by July 11, we will go ahead with Ms. Lively's deposition on July 17, beginning at 10:00 a.m. EST. For security reasons, Ms. Lively's deposition will be held at the NYC offices of Willkie Farr & Gallagher, located at 787 Seventh Avenue, New York, NY 10019. Separate and private breakout spaces will be provided for attending parties and counsel, as well as lunch and refreshments. We are also happy to coordinate logistics and building access with the court reporter and videographer if you would like. For security reasons, we will require a list of all persons who wish to attend the deposition by no later than Friday, July 11.

Thank you,
Stephanie

Stephanie Roeser
Partner

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